

Remarks

The Office Action dated April 22, 2004 has been carefully reviewed and the following remarks are made in consequence thereof.

Claims 1, 4-13, 16-24, and 27-41 are pending in this application. Claims 1, 4-8, 11-13, 16-18, 21, 23, 24, 27, 28, 31, and 33 stand rejected. Claims 9, 10, 19, 20, 22, 29, 30, 32, and 34-41 are withdrawn from consideration.

The rejection of Claims 1, 4-8, 11-13, 16-18, 21, 23, 24, 27, 28, 31, and 33 under 35 U.S.C. § 102(b) as being anticipated by Hardin et al. (US 4,288,298) is respectfully traversed.

Hardin et al. describe a reactor vessel head that includes a stationary outer ring, a large rotating plug, an intermediate rotating plug 26, and a small rotating plug 28. A transfer mechanism is positioned upon the small rotating plug during refueling periods. Cables for supplying power, etc., are routed through upper and lower compartments 34 (shown in Figure 2). The lower compartment is connected to the upper surface of intermediate rotating plug 26 and the upper compartment is connected to a side surface of small rotating plug 28 (see Figure 2).

Hardin et al. do not describe nor suggest a reactor servicing platform as recited in Claim 1. Particularly, Hardin et al. do not describe nor suggest a reactor servicing platform that includes a frame having a plurality of interconnected beams, a support structure attached to the frame, a floor attached to a top of the frame, a reactor access opening sized to permit access to the reactor pressure vessel in the floor, and at least one auxiliary platform movably coupled to the frame and extending into the access opening, with the at least one auxiliary platform movable along a perimeter of the access opening. Rather, Hardin et al. describe a reactor vessel head that includes a stationary outer ring, a large rotating plug, an intermediate rotating plug, a small

rotating plug, and upper and lower compartments attached to the upper surface of the intermediate plug and the side surface of the small plug respectively (see Figure 2).

The Office Action, at page 2, suggests that the recitation "'frame comprising a plurality of interconnected beams' reads on intermediate rotating plug 26 (note the interconnected beam structure disposed beneath this frame - see Fig. 2 for details)" and the recitation "'floor attached to and covering said frame' reads on the floor covering of plug 26". Applicants disagree with this suggestion because intermediate rotating plug 26 is not a frame but rather a mass of steel or concrete in the reactor head. The "interconnected beams" of lower compartment 34 are described as vertical and horizontal plates in Col. 4, lines 7-26 and are shown in Figure 2 to be connected to the top surface of intermediate plug 26. Applicants submit that the intermediate plug 26 and lower compartment 34 is not a floor attached to the top of a frame having a plurality of interconnected beams. Intermediate plug 26 does not include a frame comprising a plurality of interconnected beams with a floor attached to the top of the frame. If, *arguendo*, the plates of the lower compartment were considered to be interconnecting beams, Applicants submit that because they are attached to the top surface of the intermediate plug 26, Hardin et al. do not describe nor suggest a floor attached to the top of a frame comprising a plurality of interconnected beams.

Further, the Office Action, at page 2, suggests that "'auxiliary platform' reads on small rotating plug 28, which is movably coupled to the frame 26 and extends through the access opening of the floor of said frame". Applicants disagree with this suggestion because small plug 28 is movably coupled to intermediate plug 26. As explained above, intermediate plug 26 is not a frame having a plurality of interconnected beams but rather a mass steel or concrete.

Further, the Office Action, at page 2, suggests that "'support structure attached to said frame' reads on either one or both of structures 22 and 24". Applicants disagree with this suggestion because neither stationary outer ring 22 or large rotating plug 24 is attached to a frame comprising a plurality of interconnected beams. Rather, stationary outer ring 22 is attached to the reactor head flange, and large rotating plug 24 is supported by outer ring 22 and in turn supports intermediate plug 26. As explained above, intermediate plug 26 is not a frame comprising a plurality of interconnected beams. Further, neither stationary outer ring 22 nor large rotating plug 24 is a frame comprising a plurality of interconnected beams.

For the reasons set forth above, Applicants respectfully submit that Hardin et al. do not describe nor suggest a reactor servicing platform as recited in Claim 1. Accordingly, Claim 1 is submitted to be patentable over Hardin et al.

Claims 4, 7, 8 and 11-12 depend from independent Claim 1. When the recitations of dependent Claims 4, 7, 8 and 11-12 are considered in combination with the recitations of Claim 1, Applicants respectfully submit that Claims 4, 7, 8 and 11-12 likewise are patentable over Hardin et al.

Hardin et al. do not describe nor suggest a nuclear reactor as recited in Claim 12. Particularly, and as explained above, Hardin et al. do not describe nor suggest a reactor servicing platform that includes a frame having a plurality of interconnected beams, a support structure attached to the frame, a floor attached to a top of the frame, a reactor access opening sized to permit access to the reactor pressure vessel in the floor, and at least one auxiliary platform movably coupled to the frame and extending into the access opening, with the at least one auxiliary platform movable along a perimeter of the access opening. Rather, Hardin et al.

describe reactor vessel head that includes a stationary outer ring, a large rotating plug, an intermediate rotating plug and a small rotating plug and upper and lower compartments attached to the upper surface of the intermediate plug and the side surface of the small plug respectively. Accordingly, Applicants submit that Claim 13 is patentable over Hardin et al.

Claims 16-18, 21, and 23 depend from independent Claim 13. When the recitations of dependent Claims 16-18, 21, and 23 are considered in combination with the recitations of Claim 13, Applicants respectfully submit that Claims 16-18, 21, and 23 likewise are patentable over Hardin et al.

Hardin et al. do not describe nor suggest a method of servicing a nuclear reactor as recited in Claim 24. Particularly, and as explained above, Hardin et al. do not describe nor suggest a reactor servicing platform that includes a frame having a plurality of interconnected beams, a support structure attached to the frame, a floor attached to a top of the frame, a reactor access opening sized to permit access to the reactor pressure vessel in the floor, and at least one auxiliary platform movably coupled to the frame and extending into the access opening, with the at least one auxiliary platform movable along a perimeter of the access opening. Rather, Hardin et al. describe reactor vessel head that includes a stationary outer ring, a large rotating plug, an intermediate rotating plug and a small rotating plug and upper and lower compartments attached to the upper surface of the intermediate plug and the side surface of the small plug respectively. Accordingly, Applicants submit that Claim 24 is patentable over Hardin et al.

Claims 27, 28, 31 and 33 depend from independent Claim 24. When the recitations of dependent Claims 27, 28, 31 and 33 are considered in combination with the recitations of Claim

24, Applicants respectfully submit that Claims 27, 28, 31 and 33 likewise are patentable over Hardin et al.

For the reasons set forth above, Applicants respectfully request that the Section 102(b) rejection of Claims 1, 4-8, 11-13, 16-18, 21, 23, 24, 27, 28, 31, and 33 be withdrawn.

The rejection of Claim 11 under 35 U.S.C. § 103(a) as being unpatentable over Hardin et al. (US 4,288,298) in view of Spelek (US 4,115,193) is respectfully traversed.

As explained above, Hardin et al. do not describe nor suggest a reactor servicing platform as recited in Claim 1. Accordingly, Claim 1 is submitted to be patentable over Hardin et al.

Spelek describes a support system for nuclear reactor pressure vessels that includes a support flange that is bolted to both the containment vessel and the pressure vessel head flange. Spelek does not describe nor suggest a reactor servicing platform that includes a frame having a plurality of interconnected beams, a support structure attached to the frame, a floor attached to a top of the frame, a reactor access opening sized to permit access to the reactor pressure vessel in the floor, and at least one auxiliary platform movably coupled to the frame and extending into the access opening, with the at least one auxiliary platform movable along a perimeter of the access opening.

Hardin et al. and Spelek, alone or in combination, do not describe nor suggest a reactor servicing platform as recited in Claim 1. Particularly, and as explained above, Hardin et al. and Spelek, alone or in combination, do not describe nor suggest a reactor servicing platform that includes a frame having a plurality of interconnected beams, a support structure attached to the frame, a floor attached to a top of the frame, a reactor access opening sized to permit access to the reactor pressure vessel in the floor, and at least one auxiliary platform movably coupled to

the frame and extending into the access opening, with the at least one auxiliary platform movable along a perimeter of the access opening. Further, Applicants submit that it would not be obvious to attach the support structure of Spelek to large rotating plug 24 of Hardin et al. because it would prevent plug 24 from rotating. Accordingly, Claim 1 is submitted to be patentable over Hardin et al. and Spelek, alone or in combination.

Claim 11 depends from independent Claim 1. When the recitations of dependent Claim 11 are considered in combination with the recitations of Claim 1, Applicants respectfully submit that Claim 11 likewise is patentable over Hardin et al. and Spelek, alone or in combination.

For the reasons set forth above, Applicants respectfully request that the Section 103(a) rejection of Claim 11 be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Favorable action is respectfully solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael Tersillo", written over a horizontal line.

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